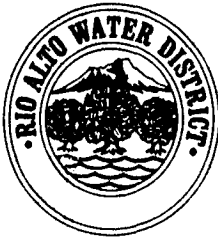


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# Rio Alto Water District

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May 26, 1998

Mr. Lester Snow, Executive Director  
CALFED Bay-Delta Program  
1416 Ninth Street, Suite 1155  
Sacramento, CA 95814

RE: Draft EIR/EIS and accompanying Documents - Response.

This response will be referring to the following documents:

- (1) The "Recommendations to CALFED" dated April 14, 1997 developed by the "Northern Sacramento Valley CAL-FED Advisory Group" and endorsed and submitted by seven Northern Sacramento Valley Counties.
- (2) CALFED EIR/EIS documents, appendices and addendums.

The following comments are being made in behalf of the Rio Alto Water District:

1. RESPONSE PERIOD -

The EIR/EIS documents were solicited by Roger Sherrill, General Manager for Rio Alto Water District on March 17, 1998 and at least three times thereafter, the documents requested did not arrive until April 17, 1998; 30 days after the 75 day response period had commenced. The original 75 days is far too short a response period for such a massive document; cutting the period short by 30 days because of CALFED's lack of preparedness and coordination is inexcusable. Rio Alto Water District appreciates the CALFED extension of the review period to July 1, 1998, however, we believe this extension still falls short of providing the necessary time to adequately review the Draft EIR/EIS and supporting documents.  
Rio Alto

Water District is therefore formally requesting an additional 30 day extension of the review for comment period involved with the EIR/EIS documents.

## 2. STORAGE COMPONENT -

The North State is unified in its numerous requests that CALFED make storage of spring and winter surface water run off a top priority in the Bay-Delta solution program. CALFED staff has all but shelved this component; a component which the Northstate believes is vital to the statewide consensus and commitment necessary for program success.

The very first sentence under "Storage" (Page 62, Phase II Interim Report) reads; "Storage may or may not be included in the CALFED alternatives". This statement underlines the CALFED staff mentality regarding additional surface water storage as a viable part of the Bay-Delta solution. Throughout the EIR/EIS documents comments have been incorporated to insure that the reader is aware that the inclusion of surface water storage as a viable part of the Bay-Delta program is questionable at best. The documents go on in programmatic detail to tactfully sabotage this component - - - no other component addressed in the EIR/EIS documents receives near the amount of negative criticism and down-playing as does storage.

The conjunctive use component of the storage element should be broken out from the surface water storage component since it is easy to see that, in CALFED's perception, it is an "acceptable" part of the solution program and through its association with the surface water storage component it is receiving a negative reflection. It would also be much easier for CALFED staff to carry out its intent in the Final Draft EIR of axing undesirable parts of what now exists as a multidimensional storage element.

The CALFED staff has not ignored the surface water storage component, to the contrary, CALFED staff has gone out of its way to minimize the positive aspects of new surface water storage facilities. The positive benefits of new water supply; erosion control, sediment disposition control, timed release, recreational enhancement, increased levee integrity, and oh yes, lets not forget flood control - - - - after all Californians have suffered billions of dollars in flood damage loses

in the past few years - - - are all being down played. In addition, CALFED staff has amplified the downside issues presented by surface storage by indicating that non-acceptance by the environmental community and the component costs are adequate reasons to degrade the merits surface water storage can lend to a proper Bay-Delta solution. CALFED staff argues that "length of time to construct" and "construction costs" are major deterrents to the surface water storage facilities - no where in these documents do I see a similar argument of the same intensity being made regarding the proposed 10,000 CFS isolated facility! There should be no doubt in anyones mind that the isolated facility is problematic by the very nature of the benefits it provides; it is a construction nightmare and it is costly. With this in mind; why is there page after page of text in support of this conveyance component and by contrast, a marginal at best discussion of the negative impacts it will employ? It appears that the answer lies in funding - - - those stakeholders that have the greatest interest in securing a clean and reliable source of water also have the ability to provide the largest source of funding and their interest is in an isolated facility not in providing the equities that additional new surface water storage facilities would provide to the agricultural based economy of the Northstate. These are the same stakeholders that are first in line to support and underwrite Northstate conjunctive use components that would move surface waters out of the Northstate, southward at a very favorable cost to benefit ratio.

Upstream westside surface water storage facilities are a necessary part of a successful Bay-Delta solution. These facilities are as cost efficient, environmentally compatible and solution oriented as an isolated facility and as such, surface water storage should receive equal, if not greater, status and support in the CALFED process.

### 3. FLOOD CONTROL -

CALFED's approach to flood control is re-active not pro-active. No one questions the need to adequately repair the existing levee system in California, however, the solution to the flood devastation experienced in January 1997 does not lie in a larger and more sophisticated levee system, but rather in controlling flood waters at their source.

Flood control via surface water storage provides the following benefits:

- . New water sources
- . Timed release
- . Erosion control
- . Deposition control
- . Control of downstream flooding
- . Recreational/local economy benefits
- . Environmental benefits
- . Increased groundwater recharge

The recovery of monies lost through economic devastation caused by annual flooding in California would go a long way toward the funding needs of storage facilities such as the Red Bank Project, Sites complex and the Thomas-Newville complex. When it comes to Northstate flooding, the CALFED staff needs to respond by resolving the flooding problems not devising mechanisms that attempt to accommodate the flooding problems. An accommodating approach has never proven effective in California.

#### 4. CONVEYANCE -

The proposed 10,000 CFS isolated facility, while providing the benefits of a higher quality more reliable source of water to Southern California, poses a number of problematic questions. To name a few:

- a) Why 10,000 CFS when 5,000 CFS will provide adequate diversion?
- b) How will the removal of 10,000 CFS affect the Delta flows - especially when the diversion demand will be at its highest when Delta flows are at their lowest?
- c) Can screening of this magnitude be engineered and constructed so that it that will work reliably?
- d) How will equitable operation be assured - especially during drought years?
- e) What, if any, assurances will be provided to Northstate stakeholders when this river to the south is placed into operation?

- f) Why should Northstate stakeholders fund such a facility?
- g) What trade offs can Northstate stakeholders expect in return for a consensus building effort to supply the south state with a cleaner, more reliable source of water (i.e. new Northstate surface water storage facilities perhaps).
- h) How can the environmental community be sold on a 10,000 CFS isolated facility without new storage to feed it?

The isolated facility has taken center stage in the Draft EIR/EIS documents to the point of being obvious. There are pressures to bear and a sell job underway. The CALFED staff might find greater acceptance and perhaps more program success if the isolated facility was reduced to the more reasonable size of 5,000 CFS.

#### 5. ASSURANCES -

The CALFED staff has compiled a listing of program issues, stakeholder concerns and the mechanisms or tools believed necessary to implement an assurances package. This effort however falls far short of what most stakeholders had hoped for out of the Draft EIR/EIS document. There must be discussion, even in draft format, of what type of assurances might be provided that would ensure that program elements and related components, once selected, will indeed be equitable to the stakeholders. There needs to be a discussion of each provision, in detail, and how it will be employed. Programmatic or not, the Draft EIR/EIS documents are inept at providing any clearer image of how an assurance package might be agreed to and then implemented. It is unfortunate that one of the most important of all resolutions for program success has fallen to last place or priority on the timeline for a preferred alternative adoption. For the past year the CALFED staff has been busy telling stakeholders they have met with that, in time, everyone's concerns will be addressed with a proper assurances package. The stakeholders and public in general have been held at bay long enough. It is past time that the CALFED staff provide a description of the type of assurances that will accompany each and every element and their respective components.

## 6. FINANCES -

Along with proper assurances, the task of financing a 10 plus billion dollar effort over 30 years remains the biggest single stumbling block to the success of the CALFED program. As the Manager of a Water District I have been approached repeatedly by District constituents and others with the same question in mind - - - how much is this CALFED fix to California's water problems going to raise my water rates and/or increase my tax base. The second related question is; why should those of us who live in Northern California, who already have adequate resources and who are not the cause of the multitude of problems that face the Bay-Delta ecosystem, pay an equivalent share of the enormous cost of resolution?

These, and other pertinent questions involving the mechanism for financing such a program, have become a consensus breaker. If there is to be equity in a financial solution then those entities and the public they support that have an elevated interest in securing a higher quality, greater quantity and more reliable source of raw drinking water must buck-up to table and shoulder the burden of solving the water demand and ecosystem problems they have created. There is no part of the CALFED solution to the Bay-Delta crisis that Central and even more so Southern California should not be fully vested in and fully supportive of!

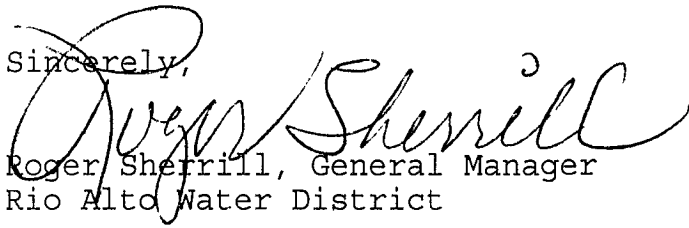
The fact that California is one state and economies both north and south support one government and one citizenry is an argument that can best be used in defining the program needs that will, if implemented, give best hope of success. However, the mentality of "one state - one people, lets all share the pain," does not play well outside of the physical needs of the solution as it is defined by the Draft EIR/EIS documents. CALFED staff has put together a list of concerns and a general list of funding mechanisms that might comprise a "Financial package," but once again there is no indication of how these findings may be applied assuming that the CALFED program continues to move forward. Like assurances, the funding of such an enormous undertaking is an issue that has the sole potential to de-rail the entire CALFED process and like assurances, it too, has been left for a last minute unveiling.

The stakeholders and public have been kept in the dark long enough - it's past time that CALFED put a face on those critical areas (Assurances and Funding) that have been so carefully maneuvered around in the Draft EIR/EIS documents.

The CALFED self imposed December 1998 deadline is already on the doorstep and too many of us have been asked repeatedly to give comment without the benefit of program substance. The documents "General approach" and "Programmatic" tone needs to be permanently shelved and the pertinent problem of how do we accomplish such an ominous feat needs to be un-veiled. Rio Alto Water District can only hope that the Final Draft EIR will be adequately focused and be specific in laying out a plan for success.

We look forward to its release and timely distribution, and an opportunity to again comment on a program whose success is essential to all Californians

Sincerely,

  
Roger Sherrill, General Manager  
Rio Alto Water District

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cc: Rio Alto Water District Board of Directors  
Tehama County Flood Control and Water Conservation District  
Board of Directors

DEPARTMENT OF  
WATER RESOURCES  
SACRAMENTO

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